

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,  
Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**CURLING PLAINTIFFS' LIST OF SEALED EXHIBITS**

Curling Plaintiffs expect to present the following exhibits, which State Defendants have designated as Attorneys' Eyes Only<sup>1</sup>:

- GEMS database screenshots;
- Unredacted version of transcript of Deposition of Dr. Michael Shamos;
- Video Testimony Excerpts from Deposition of Dr. Michael Shamos;
- Risk Assessments underlying Ms. Payton's Declaration; and
- Interview Notes underlying Ms. Payton's testimony that the Court ordered produced.

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<sup>1</sup> Curling Plaintiffs do not agree that any of the materials identified here that State Defendants have designated Attorneys Eyes Only satisfy the exacting standard for such treatment in court, with two possible caveats: (1) Curling Plaintiffs have only just received these interview notes and will come prepared to address the confidentiality designations at tomorrow's hearing after reviewing them; (2) Curling Plaintiffs proposed State Defendants identify specific, narrow redactions to the Risk Assessments which Curling Plaintiffs will review once received and be prepared to address with the Court at the hearing.

Dated: July 24, 2019

Respectfully submitted,

/s/ David D. Cross  
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John P. Carlin (*pro hac vice*)  
Catherine L. Chapple (*pro hac vice*)  
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**CERTIFICATE OF COMPLIANCE**

Pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

*/s/ David D. Cross*  
David D. Cross

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 24, 2019, a copy of the foregoing **CURLING PLAINTIFFS' LIST OF SEALED EXHIBITS** was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

*/s/ David D. Cross*  
David D. Cross